

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In Re: AUM SHRI GANESHAY NAMAHA,
LLC,
Debtor.

CHAPTER 11
CASE NO. 19-54787-WLH

In Re: COVINGTON LODGING, INC.
Debtor

CHAPTER 11
CASE NO. 19-54789-WLH

In Re: JANAM MADISON LODGING, LLC,
Debtor

CHAPTER 11
CASE NO. 19-54790-WLH

In Re: JANAM TACCOA LODGING, LLC,
Debtor

CHAPTER 11
CASE NO. 19-54792-WLH

In Re: OHM CONYERS LODGING, LLC,
Debtor

CHAPTER 11
CASE NO. 19-54795-WLH

In Re: SANAM ATHENS LODGING, LLC,
Debtor

CHAPTER 11
CASE NO. 19-54796-WLH

In Re: SANAM CONYERS LODGING, INC.,
Debtor

CHAPTER 11
CASE NO 19-54798-WLH

**DEBTORS' MOTION FOR ORDER DIRECTING
JOINT ADMINISTRATION OF RELATED BANKRUPTCY CASES**

The above captions debtors and debtors in possession (collectively referred to herein as “the Debtors”) hereby file this *Motion for Order Directing Joint Administration of Related Bankruptcy Cases* (“the Motion”), respectfully showing the following:

JURISDICTION AND VENUE

1. Each of the Debtors commenced their respective cases by the filing of voluntary petitions in this Court on March 26, 2019 under Title 11 of the Bankruptcy code, 11

U.S.C.A. 1101, et seq.

2. This Court has jurisdiction over each of the Debtors and over this matter pursuant to 28 U.S.C. §§157, 1334.
3. This is a Core Proceeding within the meaning of 28 U.S.C. §157(b)(2).
4. Venue is proper in this District pursuant to 28 U.S.C §§ 1408, 1409.

THE DEBTORS

5. Each of the Debtors are single asset real estate cases, which real estate concern the ownership and management of one hotel or inn located in Georgia for each Debtor.
6. Each of the Debtors have common ownership; to wit, Sunita Patel holds a majority of equity interests in each of the Debtors.
7. Each of the Debtors have common management, that being 2019 Hotel Company, LLC.
8. Each of the Debtors have designated the same entity as their personal representative in their bankruptcy cases, that being 2019 Hotel Company, LLC.
9. Each of the Debtors share common creditors.

RELIEF REQUESTED

10. Debtors hereby seek the joint administration of their Chapter 11 Cases pursuant to Bankruptcy Rule 1015(b).
11. The parties seek administration of their cases under the Chapter 11 Case of Sanam Conyers Lodging, LLC, such that a single docket is utilized for matters relating to the administration of the estates.
12. This is not a request for substantive consolidation, and Debtors request that separate files be maintained for proofs of claim.

13. Debtor will also separately file the monthly operating reports required by the Operating Guidelines and Reporting Requirements for Debtor in Possession promulgated by the Office of the United States Trustee for Region 21.
14. The Debtors are not aware of any administrative or scheduling orders entered in any of the cases which would require modification.
15. The Debtors propose that the caption of their jointly administered chapter 11 cases be as follows:

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:	:	CHAPTER 11
SANAM CONYERS LODGING, LLC, et al.	:	Jointly Administered Under
Debtors	:	CASE NO. 19-54798-WLH

16. The Debtors further propose that a docket entry be made in each of the above captioned cases in substantially the following language:

An order has been entered in this case directing joint administration of this case with the Chapter 11 Bankruptcy case of Sanam Conyers Lodging, Case No. 19-54798-WLH. The docket in Chapter 11 case of Sanam Conyers Lodging should be consulted for all matters affecting this case. All further pleadings or other papers shall be filed in the case of Sanam, Case No. 19-54798-WLH
17. The Debtors also propose that the Court authorize the Debtors to utilize a combined service list for the jointly administered cases and combined notices to creditors of the Debtors' estates and parties-in interest.
18. The Debtors further propose that the Court waive the requirement of Bankruptcy Code §342(c)(1) that notices by the Debtors contain the name, address and last four

digits of the taxpayer identification number of each debtor.

19. The Debtors anticipate that it will become necessary to file numerous motions and applications seeking relief on behalf of all of the Debtors, and submit that joint administration of their Chapter 11 cases is in the best interests of their estates, their creditors, and parties in interest, and will promote judicial economy by obviating the need for duplicate motions, orders, and notices.
20. Bankruptcy Rule 1015(b) authorizes joint administration of bankruptcy cases of a debtor and its affiliates, and this Court has authority to grant the relief requested.
21. Notice of this Motion and/or any scheduled hearing on this Motion will be served on the Office of the United States Trustee, on all creditors, and all parties requesting notice.

WHEREFORE, the Debtors pray that this Court enter an order granting relief, in a form substantially similar to the order submitted herewith as **Exhibit A**, granting the Debtors the relief requested herein and such other and further relief as is just and equitable.

This 2nd day of April 2019.

/s/ Edward F. Danowitz

By: Edward F. Danowitz

Ga. State Bar No. 003180

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CERTIFICATE OF SERVICE

This is to certify that I have this day served the United States Trustee and parties requesting notice in the within and foregoing matter with a copy of the attached *DEBTOR'S MOTION FOR ORDER DIRECTING JOINT ADMINISTRATION OF RELATED BANKRUPTCY CASES* by depositing the same in the United States Mail with proper postage affixed to:

United States Trustee
362 Richard B. Russell Building
75 Ted Turner Dr. SW
Atlanta, GA 30303

And to those persons and entities appearing on the mailing matrix.

This 2nd day of April 2019.

/s/ Edward F. Danowitz
Edward F. Danowitz.
Ga. Bar No. 003180

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